

**MINORITY MEDIA AND
TELECOMMUNICATIONS COUNCIL**

ORIGINAL

3636 16th Street N.W., Suite BG-54
Washington, D.C. 20010

David Honig, Executive Director
Phone: (202) 332-7005 Fax: (202) 332-7511
e-mail: dhonig@crosslink.net

Henry M. Rivera
Chairperson

Erwin Krasnow
Vice Chairperson

Lawrence Roberts
Secretary

Everett C. Parker
Treasurer

BOARD OF DIRECTORS

Andrew C. Barrett
Antoinette Cook Bush
Jeneba Jalloh Ghan
Julia Johnson
Erwin Krasnow
Nicolaine Lazane
Alex Nogales
Everett C. Parker
Henry M. Rivera
Lawrence Roberts
Andrew Schwartzman
S. Jenell Trigg
Herbert Wilkins

BOARD OF ADVISORS

Raul Alarcon, Jr.
Eddie Arnold
Tyrone Brown
Amador Bustos
Angela Campbell
Thomas Castro
Jannette Dates
Belva Davis
Moctesuma Esparza
Jerome Fowlkes
Frank Halfacre
John Hane
Janis Hazel
Ragan A. Henry
Leo Hindery
Reginald Hollinger
Larry Irving
Eli Noam
Vincent A. Pepper
Benjamin Perez
Linda Eckard Vilardo
Anthony Williams
Edward Young

October 17, 2002

RECEIVED

OCT 21 2002

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Ms. Dortch

RE: MB Docket No. 02-277 (Biennial Review of
Broadcast Ownership Rules)

MM Docket No. 01-235 (Broadcast/Newspaper
Crossownership)

MM Docket No. 01-317 (Local Radio Ownership)

MM Docket No. 00-240 (Definition of Radio
Markets)

Pursuant to 47 CFR §1.1206, this will disclose that in these permit-but-disclose proceedings, representatives of the Minority Media and Telecommunications Council ("MMTC"), the League of United Latin American Citizens ("LULAC") and the National Association of Black Owned Broadcasters ("NABOB") made an oral ex parte presentation at a Wednesday, October 16, 2002, 4:30 PM meeting with Commissioner Michael Copps and Alexis Johns, Esq., Legal Assistant to Commissioner Copps. Our delegation consisted of Eduardo Pena, Esq., communications counsel for LULAC, James Winston, Esq., Executive Director of NABOB, and myself.

We presented copies of the "Motion for Revision of Procedural Dates, Expansion of the Scope of the Proceeding, and Inclusion of Additional Studies in the Record" filed by MMTC and NABOB (dated October 9, 2002 and filed October 10, 2002). We maintained that because of the wide scope and complexity of the issues in the proceeding, the short time limits for public comment would ensure that parties would just submit their hard

10/17/02

012

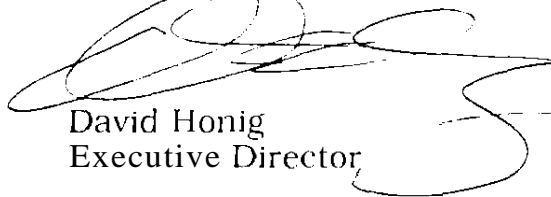
line views, without the benefit of consultation with other parties or empirical research. We stated that MMTC was going to convene a meeting of stakeholders in the next few weeks to examine how the issues in the proceeding can be narrowed, whether research can be performed jointly by the parties, and whether regulatory relief in these proceedings could be fashioned to promote minority ownership. We also stated that we favored broad public debate regarding the issues in the proceeding.

We discussed some of the fourteen FCC-sponsored research studies in the record, noting that while most of the studies appeared methodologically sound albeit limited in scope, the studies did not adequately address the issues of minority ownership and minority inclusion in program service.

We suggested that a supplement to the NPRM be issued to ask the parties to comment on how minority ownership would be affected and how it can be promoted through the ownership rules under consideration. Further, we suggested that the Commission should continue its policy, followed since 1995, of examining attribution rules in concert with its structural ownership rules. Finally, we urged the inclusion of five of the Section 257 (Adarand) studies in the record of the omnibus ownership proceeding.

An original and two copies of this letter are being filed with the Secretary

Respectfully submitted,



David Honig
Executive Director

cc: Hon. Michael Copps
Alexis Johns, Esq.

/dh